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6 Attorneys for Plaintiff
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,

CASE NO. 2:21-CR-207 TLN

12 Plaintiff,

STIPULATION AND ORDER RE:
CONTINUANCE OF STATUS CONFERENCE

13 v.

14 KI JANG,

15 Defendant.

16

17 The United States and the defendant stipulate as follows:

- 18 1. By previous order, this matter was set for status conference on July 13, 2023.
19 2. By this stipulation, defendant now moves to continue the hearing to September 21, 2023.

20 The defendant and the government (the “parties”) also jointly move to exclude time between July 13,
21 2023, and September 21, under Local Code T4.

- 22 3. The parties agree and stipulate, and request that the Court find the following:
23 a) The government has represented that the discovery associated with this case
24 includes approximately 30,000 pages of law enforcement reports, bank records, photographs,
25 audio recordings, and search warrant items. All of this discovery has been either produced
26 directly to counsel and/or made available for inspection and copying.
27 b) Counsel for defendant desires additional time to consult with his client, to review
28 the current charges, to conduct investigation and research related to the charges, to review

1 discovery for this matter, to discuss potential resolutions with her client, and to otherwise prepare
2 for trial.

3 c) Counsel for defendant believes that failure to grant the above-requested
4 continuance would deny them the reasonable time necessary for effective preparation, taking into
5 account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of July 13, 2023 to September 21,
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
13 because it results from a continuance granted by the Court at defendant's request on the basis of
14 the Court's finding that the ends of justice served by taking such action outweigh the best interest
15 of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

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20 IT IS SO STIPULATED.

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22 Dated: June 28, 2023

PHILLIP A. TALBERT
United States Attorney

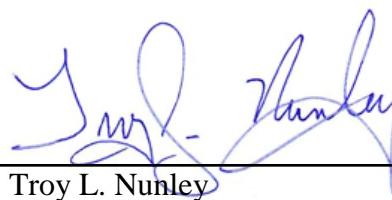
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24 /s/ Audrey B. Hemesath
25 Audrey B. Hemesath
26 Assistant United States Attorney
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28

1 Dated: June 28, 2023

/s/ CHRISTOPHER COSCA
CHRISTOPHER COSCA
Counsel for Defendant
Ki Jang

6 **ORDER**

7 IT IS SO FOUND AND ORDERED this 28th day of June, 2023.

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Troy L. Nunley
United States District Judge

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